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Comptroller of the Currency  
Administrator of National Banks

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1114 Avenue of the Americas, Suite 3900  
New York, New York 10036-7780

**Conditional Approval #395**  
**June 2000**

May 10, 2000

Board of Directors  
Security National Trust Co.  
1300 Chapline Street  
Wheeling, West Virginia 26003

Re: Authorization to Commence Business - Security National Trust Co., Wheeling, West Virginia (CAIS  
2000-NE-01-0015)

Dear Board Members:

The Comptroller of the Currency (OCC) has found that you have met all requirements it imposed and completed all steps necessary to commence business as a limited purpose national trust company. Accordingly, Security National Trust Co. is authorized to commence business effective May 15, 2000. The OCC Charter Certificate (Charter # 24010) is enclosed.

This approval is subject to the condition that the trust company shall provide Assistant Deputy Comptroller William P. Reinhardt at least thirty (30) days prior notice of any significant deviation or change from the proposed operating plan during the bank's first three years of operation. This condition is enforceable under 12 U.S.C. ' 1818.

You are reminded that several of the standard requirements contained in the preliminary approval letter dated March 27, 2000, will continue to apply once the bank opens and by opening, you agree to subject your association to these conditions of operation. Some of the requirements bear reiteration here:

1. Regardless of the association's FDIC insurance status, the association is subject to the Change in Bank Control Act (12 USC 1817(j)) by virtue of its national bank charter.
2. The board of directors is responsible for regular review and update of policies and procedures and for assuring ongoing compliance with them. This includes maintaining an internal control system that ensures compliance with the currency reporting and record keeping requirements of the Bank Secrecy Act (BSA). The board must train its personnel in BSA procedures and designate one person or a group to monitor day-to-day

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compliance.

3. The trust company will not engage in full commercial powers authorized to national banks without the OCC's prior approval.

Questions regarding the ongoing supervision of the trust company should be directed to Assistant Deputy Comptroller William P. Reinhardt at (212-790-4020) or EIC Roberta Ouimette at the New York Field Office ((212) 819-9860).

Sincerely,

**-signed-**

MICHAEL G. TISCIA  
Licensing Manager